

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

The Michelin Retirement Plan and the
Investment Committee of the Michelin
Retirement Plan,

Plaintiffs,

v.

Dilworth Paxson, LLP, BFG Socially
Responsible Investments, Ltd., Burnham
Financial Group, Inc., Burnham Securities,
Inc., COR Fund Advisors, LLC, GMT Duncan,
LLC, Greenberg Traurig, LLP, Thorsdale
Fiduciary and Guaranty Company Ltd., U.S.
Bank National Association, Valor Group Ltd.,
Wakpamni Lake Community Corp., Wealth-
Assurance AG, Wealth Assurance Private
Client Corporation, Timothy B. Anderson, Jon
Michael Burnham, Devon D. Archer, Bevan T.
Cooney, Hugh Dunkerley, Jason W. Galanis,
John P. Galanis, Gary T. Hirst, Frankie D.
Hughes, and Michelle A. Morton,

Defendants.

Case No. 6:16-CV-03604-HMH-JDA

AFFIDAVIT OF J. DERRICK QUATTLEBAUM

Personally appeared before me J. Derrick Quattlebaum who, after being sworn, deposes
and states that:

1. Pursuant to Federal Rule of Civil Procedure 4(d), and by letter dated November
22, 2016, the above-captioned Defendant Valor Group, Ltd. was notified of the commencement
of this action, provided with a copy of the Complaint as well as Plaintiff's Responses to Local
Rule 26.01 Interrogatories, and provided with a Waiver of Service. A true and accurate copy of
the letter, excluding attachments, is attached hereto as Exhibit A.

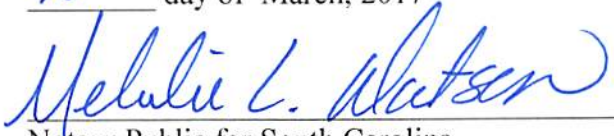
2. Defendant Valor Group, Ltd. failed to return the Waiver of Service and was therefore served by personally delivering the Summons, Complaint and Plaintiff's Responses to Local Rule 26.01 Interrogatories on February 7, 2017, to Hugh Dunkerley as an officer of Defendant Valor Group, Ltd pursuant to Rule 4(h)(1)(B) of the Federal Rules of Civil Procedure as evidenced by the Affidavit of Service attached hereto as Exhibit B (ECF No. 95-2). At the time of service, as confirmed in the Affidavit of Service (Exhibit B), Mr. Dunkerley confirmed to the server that he was authorized to accept service on behalf of the Defendant Valor Group, Ltd.

3. Defendant Valor Group, Ltd.'s response to the Summons and Complaint was due on or before February 28, 2017.

4. Defendant Valor Group, Ltd. has failed to answer, move or otherwise respond to the Complaint.


J. Derrick Quattlebaum

Sworn to and subscribed before me this
10 day of March, 2017


Notary Public for South Carolina
My Commission Expires: 5-31-2022

